

JOHN W. HUBER, United States Attorney (#7226)
KARIN M. FOJTIK, Assistant United States Attorney (#7527)
Attorneys for the United States of America
Office of the United States Attorney
111 South Main Street, Suite 1800
Salt Lake City, Utah 84111-2176
Telephone: (801) 524-5682

FILED
U.S. DISTRICT COURT

2019 JAN -9 P 4:21

DISTRICT OF UTAH

CITY CLERK

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

STONEY WESTMORELAND,

Defendant.

INDICTMENT

VIOLATION:

18 U.S.C. § 2422(b), COERCION AND
ENTICEMENT (Count 1).

Case: 2:19-cr-00014
Assigned To : Parrish, Jill
Assign. Date : 1/9/2019
Description: USA V.

The Grand Jury Charges:

COUNT 1

Coercion and Enticement
(18 U.S.C. § 2422(b))

On or about December 13, 2018, in the Central Division of the District of

Utah,

STONEY WESTMORELAND,

the defendant herein, did knowingly and intentionally, by means of a facility of interstate

commerce, persuade, induce, entice, and coerce any individual who had not attained the age of 18 years, to engage in sexual activity for which a person can be charged with a criminal offense, and attempted to so persuade, induce, entice, and coerce; and did aid and abet; all in violation of 18 U.S.C. § 2422(b).

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

Pursuant to 18 U.S.C. § 2428, upon conviction of a violation of 18 U.S.C. §§ 2422, 2423, or 2425 as alleged in Count 1 of this Indictment, the above-named defendant shall forfeit to the United States (i) his interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation; and (ii) any property, real or personal, constituting or derived from any proceeds that the defendant obtained, directly or indirectly, as a result of such violation. The property to be forfeited includes, but is not limited to, the following:

- MacBook Pro – Silver
- 3 Thumb drives
- iPhone in blue case

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

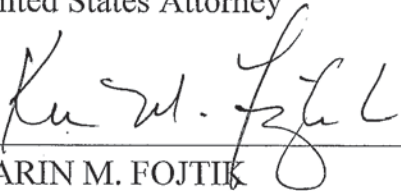
- e. has been commingled with other property which cannot be divided
without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant
to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

TRUE BILL:

FOREPERSON OF THE GRAND JURY

JOHN W. HUBER
United States Attorney



KARIN M. FOJTIK
Assistant United States Attorney